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Via ECF and E-Mail

Honorable Diane Gujarati
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Russo, et al.*, 21 Cr. 466 (DG)

Dear Judge Gujarati:

We represent Mr. Benjamin Castellazzo in the above-referenced matter, having been appointed as counsel pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A, on September 14, 2021. We write on behalf of my client to respectfully request that the Court grant a modification to his bail conditions, removing the condition of home detention and replacing it with a curfew.

On March 9, 2022, Mr. Castellazzo was released on bond and has since been fully compliant with all terms of his release. A curfew would be helpful to Mr. Castellazzo, as he attends numerous medical appointments a week due to his myriad health conditions. Though his current bail conditions allow him one hour a day to walk around the grounds of his senior living center, at his age, it would be beneficial to his health if he spent more time being active.

Mr. Castellazzo has shown, since his release on bail, that home confinement is unnecessary for community safety. Accordingly, it is requested that the home confinement condition be removed and replaced with a curfew, whereby Mr. Castellazzo will be permitted outside his residence from 7 A.M. to 8 P.M. or any other schedule deemed appropriate by Pretrial Services.

Pretrial Services and the Government have no objection to the above modification. Thank you for your consideration of this request.

Respectfully submitted,

/s/

Kestine M. Thiele, Esq.
Jennifer Louis-Jeune, Esq.